

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

AMANDA STALLARD, *et al.*

v.

FIFTH THIRD BANK, *et al.*

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2:12-cv-01092-MRH

**MOTION FOR THE PRO HAC VICE
ADMISSION OF ATTORNEY SETH R. LESSER**

Plaintiffs Amanda Stallard and Tamika Strong, on behalf of themselves and others similarly situated and by and through their undersigned attorney Peter Winebrake, respectfully move for the *pro hac vice* admission of Attorney **Seth R. Lesser**. Attorney Lesser's *pro hac vice* admission should be permitted, pursuant to Local Civil Rule 83.2.B, for the reasons described below:

1. Attorney Winebrake, who serves as Attorney Lesser's sponsor, is licensed to practice in the Commonwealth of Pennsylvania (PA Bar No. 80496) and is a member in good standing of this Court. Attorney Winebrake knows Attorney Lesser to be an attorney of high character, competence, and integrity.

2. Attorney Lesser maintains an office at Two International Drive, Suite 350, Rye Brook, New York 10573. His office telephone is 914-934-9200; his office fax number is (914) 934-9220; and his email is seth@klafterolsen.com. Mr. Lesser is a member in good standing of the following courts:

New Jersey (state) – 12/19/88
District of New Jersey (federal) – 12/19/88
New York (state) – 4/17/89
Southern District of New York (federal) – 9/26/89
Eastern District of New York (federal) – 10/23/89
District of Columbia (state) – 3/2/90

District of Columbia Circuit (federal) – 1/3/94
Ninth Circuit (federal) – 5/7/97
Tenth Circuit (federal) – 6/9/97
United States Supreme Court – 1/12/98
Second Circuit (federal) – 7/29/98
District of Colorado – 12/15/00
Sixth Circuit (federal) – 2/28/01
First Circuit (federal) – 10/22/02
Third Circuit (federal) – 7/11/03
Central District of Illinois (federal) – 4/20/04
Seventh Circuit (federal) – 7/30/2004
Eleventh Circuit (federal) – 12/9/2005
Northern District of New York (federal) – 3/7/2006
District of Connecticut (federal) – 7/7/2006
Western District of New York (federal) – 5/20/2010
Western District of Michigan (federal) – 6/14/2010

3. Attorney Lesser has never been the subject of any disciplinary action in any jurisdiction and has never been denied admission to any court.

4. As indicated by the accompanying declaration, Attorney Lesser is a registered user of this Court's ECF system and has read and understands this Court's Local Rules.

WHEREFORE, Plaintiffs respectfully request that the Court admit attorney Lesser *pro hac vice*. A proposed order is attached.

Dated: September 3, 2012

/s/ Peter Winebrake
Peter Winebrake
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